

LEO M. BRAUSCH
ENVIRONMENTAL MANAGEMENT CONSULTANT

(b) (6)
Gibsonia, PA 15044-9795
Office: (724) 444-0377
Cell: (b) (6)
Fax: (724) 444-0351
Email: lbrausch@fyi.net

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February 5, 2010

Mr. James J. Hahnenberg
Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

**Re: Monthly Progress Report for January 2010, North Bronson Industrial Area Site
Operable Unit 1, Bronson, Michigan**

Dear Mr. Hahnenberg:

The North Bronson Potentially Responsible Parties Group (the Group) submits this monthly progress report to the U.S. Environmental Protection Agency (USEPA), Region 5, pursuant to Article X (Reporting Requirements), Paragraph 31 of the Consent Decree for Operable Unit 1 at the North Bronson Industrial Area (NBIA) Site. This report summarizes efforts by the Group to fulfill the requirements of the Consent Decree for Remedial Design and Remedial Action (RD/RA) at the site during January 2010.

1. Activities Completed During This Reporting Period

- A. On January 8, 2010, the Group submitted the December 2009 monthly progress report to USEPA with copies to the Michigan Department of Natural Resources & Environment (MDNRE).
- B. On January 22, 2010, representatives of USEPA, MDNRE, and the Group met by conference call to discuss the proposed City of Bronson groundwater restriction ordinance.
- C. Via letter dated January 27, 2010, the Group proposed additional investigative activities to complete the Groundwater Delineation Study associated with the Western Lagoon Area in response to earlier discussions with USEPA and MDNRE representatives.

- D. In that same January 27, 2010 correspondence, the Group set forth its initial plans to seek environmental restrictive covenants for potentially affected properties in Bronson Township.

2. Results of Sampling and Tests and Other Data

- A. The Group developed no sampling or test data during the reporting period.

3. Work Plans, Procedures, and Deliverables

- A. In response to discussions among the Group, USEPA, and MDNRE representatives on December 18, 2009, the Group proposed additional investigations to complete the Western Lagoon Area Groundwater Delineation Study via letter dated January 27, 2010.
- B. The Group submitted no other work plans, procedures, or deliverables during the reporting period.

4. Actions Projected for Next Six-Week Period

- A. Per discussions with the USEPA, the Group will implement the *County Drain #30 Sediment and Soil Sampling Work Plan* as soon as spring weather and ground conditions allow for efficient sampling.
- B. The Group plans to make initial contacts with landowners to discuss environmental restrictive covenants for potentially affected properties in Bronson Township.
- C. Actions for the next six-week period related to the Western Lagoon Area Groundwater Delineation Study depend on the timing of USEPA's approval of the latest Group submittal and its authorization to proceed, as described in Item 5.A below.

5. Progress and Schedule Report

- A. Near-term milestones for on-going Group activities are as follows:

County Drain #30 Sediment and Soil Sampling

- Per discussions with the USEPA, the Group will implement the *County Drain #30 Sediment and Soil Sampling Work Plan* as soon as spring weather and ground conditions allow for efficient sampling. The

projected schedule for this activity is provided in the corresponding work plan.

Western Lagoon Area Groundwater Delineation Study

- Following USEPA approval, the Group will complete the Western Lagoon Area Groundwater Delineation Study, including installation of additional wells as described in its letter of January 27, 2010 and a second round of groundwater sampling of newly installed wells. The estimated timeframe for this activity, including laboratory analysis, data validation, and reporting, is eight weeks after mobilization. This work would be most efficiently completed concurrent with the County Drain #30 sediment and soil sampling and prior to the start of the growing season for local agricultural crops.

Private Well Connections

- The remaining water line connections for residents within the Restricted and Buffer Zones with private wells are now scheduled for the spring of 2010.

City Groundwater Ordinance

- The Group will coordinate with the City, revise the proposed City Groundwater Ordinance pursuant to review comments received from MDNRE, and submit this revised Ordinance to USEPA following completion of the City water connections and private well closures.
- B. As discussed in our project review meeting of March 17, 2009 and subsequently, progress related to RD/RA for enhanced source control at the Eastern and Western Lagoon Areas and County Drain #30 remediation requires resolution of appropriate cleanup standards for non-erodible soils associated with County Drain #30 and groundwater to surface water interface criteria.
- C. There are currently no other unresolved issues that affect the performance or timing of pre-design or RD activities.

6. Summary of Proposed or Approved Changes to the Work Plans or Schedules

- A. The work plans for the County Drain #30 Sediment and Soil Sampling and the Western Lagoon Area Groundwater Delineation Study include addenda to the Pre-Design Studies Field Sampling and Quality Assurance Plan. These addenda provide for additional sampling and analytical protocols associated

with those efforts. These work plans also include addenda to the site Health and Safety Plan to address task-specific health and safety issues.

- B. The near-term milestones associated with the most-recent working schedule update are those identified in Item 5.A above.

7. Activities Undertaken in Support of the Community Relations Plan

- A. The Group did not undertake any activities during this reporting period in support of the Community Relations Plan.

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We trust that this submittal satisfies your requirements at this time. If you have questions regarding this monthly progress report or related project matters, please do not hesitate to contact me.

Respectfully submitted,



Leo M. Brausch
Project Coordinator

LMB:

cc: Deborah D. Larsen, MDNRE
Charles W. Graff, MDNRE

cc (via email):

NBIA Operable Unit 1 PRP Group Legal Committee
NBIA Operable Unit 1 PRP Group Technical Committee